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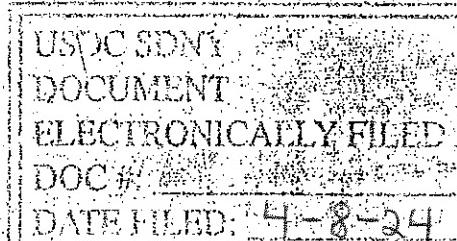
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April 5, 2024

By ECF

Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312



Re: *United States v. Cyron Lee, 23 Cr. 591 (LAK)*

Dear Judge Kaplan:

We write on behalf of defendant Cyron Lee to respectfully request that the Court order the Metropolitan Detention Center ("MDC") to allow Mr. Lee out of his cell for up to four hours a day to review discovery in his case. The government has no objection to this request.

Mr. Lee has been incarcerated at the MDC since October 31, 2023, and the government made its first discovery production to counsel on December 21, 2023. While the government provided hard drives with the discovery to the MDC's law library shortly thereafter, Mr. Lee has been unable to meaningfully access those materials because of near constant lockdowns at the jail.

At our request, the government has now facilitated the transfer of the electronic law library materials to Mr. Lee's cell. However, we understand from our client that he is still unable to review discovery – other than with counsel – because of the ongoing lockdowns. On the rare occasions where he has been permitted to leave his cell, he has had to contend with more than a hundred inmates vying for the use of a single unit computer.

Mr. Lee is scheduled to go to trial on May 7, 2024 and needs to be able to review the available discovery to ensure his right to a fair trial. We thank the Court for its consideration of this request.

→ Granted

Respectfully submitted,

/s/ *Telemachus Kasulis*
Telemachus Kasulis

SO ORDERED

Lewis A. Kaplan, USA